

April 17, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, D.C. 20554

**Re: *Ex Parte* Presentation
CC Docket 94-102**

Dear Ms. Dortch:

On Monday, April 16, 2007, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, Paul Garnett, Assistant Vice President, Regulatory Affairs and Brian Josef, Director, Regulatory Affairs, CTIA – The Wireless Association®, met with Dana Shaffer, Deputy Bureau Chief, Jeffrey Cohen, Senior Legal Counsel and Carol Simpson, Legal Counsel in the Public Safety and Homeland Security Bureau, to discuss issues relating to a pending Request for Declaratory Ruling filed by the Association of Public-Safety Communications Officials - International (“APCO”).

During the meeting, CTIA noted reports regarding the Commission’s consideration of a testing requirement for Enhanced 911 (“E-911”) technologies that could impose new, more granular accuracy testing by wireless carriers. CTIA expressed its willingness to work with the Commission and Public Safety groups to pursue feasible, more-accurate testing methods, but highlighted its procedural concerns with the Commission issuing a Declaratory Ruling without seeking notice and comment from interested parties on the APCO Petition.

Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being electronically filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

/s/ Christopher Guttman-McCabe

Christopher Guttman-McCabe

cc: Dana Shaffer
Jeffrey Cohen
Carol Simpson